

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

CLERK US DISTRICT COURT
NORTHERN DIST. OF TX
FILED

2015 NOV 16 PM 12:41

DEPUTY CLERK A

UNITED STATES OF AMERICA

v.

CASSANDRA SIMS

CRIMINAL NO.

3-15CR-519-L

FACTUAL RESUME

The defendant, Cassandra Sims, has reviewed with her attorney, Sarah Duncan, and acknowledges that she understands in order to establish her guilt for Count ^{four} ~~One~~ of the Information filed against her, namely: Commission of a False Statement or Fraud to Obtain Federal Employees' Compensation, in violation of 18 U.S.C. § 1920, the government would have to prove each of the following elements beyond a reasonable doubt:

- First:* The Defendant knowingly and willfully made a false statement or report to the Department of Labor, Office of Workers' Compensation Programs;
- Second:* The false statement or report was made in connection with an application for or receipt of Federal Workers' Compensation benefits; and
- Third:* The false statement or report related to a material fact.

Source: Adapted from Pattern Crim. Jury Instr. 11th Cir. 69 (2010).

Stipulated Facts


Beginning in or about December 2012, and continuing through September 4, 2014, in the Dallas Division of the Northern District of Texas, Cassandra Sims, with the intent to defraud, and to continue to receive workers' compensation benefits to which she was

not entitled, knowingly and willfully provided false information the United States Department of Labor, Office of Workers' Compensation Programs (DOL/OWCP) in connection with an application for and receipt of compensation and other benefits and payments under Title 5, United States Code, Chapter 81, Subchapter I and III.

Specifically, during the above time period, Sims completed, signed, submitted and caused to be submitted fraudulent medical documents to a co-conspirator, Larry Washington, and Sims knew Washington used the fraudulent documentation to file false claims and receive payment from DOL/OWCP for services not rendered. The medical documents were referred to as "Mood Inventories." Sims received the blank Mood Inventories from another co-conspirator, David Banda, an employee of Washington, along with calendars marked with dates for her to use on the fraudulent medical documents.

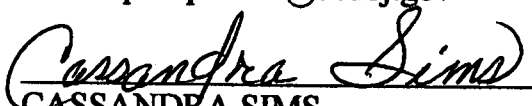
Upon completion and submission of the false documents to Washington, Sims was paid for the forms she filled out. Sims received a total of \$1,000.00 from Washington for completing fraudulent "Mood Inventories," all of which was received in cash and checks. Washington received over \$30,958.64 from DOL/OWCP based on falsified medical documents completed by Sims.

This factual resume is not intended to be a complete accounting of all the facts and events related to the offense charged in this case. The limited purpose of this statement of facts is to demonstrate that a factual basis exists to support Sims' guilty plea to Count ^{four} One set forth in the Information.




P.J. MEITL
Assistant United States Attorney
District of Columbia Bar No. 502391
Virginia Bar No. 73215
1100 Commerce Street, Third Floor
Dallas, Texas 75242-1699
Telephone: 214.659.8680
Facsimile: 214.659.8812
Email: philip.meitl@usdoj.gov

11/5/2015
Date



CASSANDRA SIMS
Defendant

10-8-2015
Date



SARAH DUNCAN
Attorney for the Defendant

10-8-15
Date